



UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF WEST VIRGINIA

Lonnie K. Crane _____

(Enter above the full name of the plaintiff
or plaintiffs in this action).

(Inmate Reg. # of each Plaintiff)

VERSUS

CIVIL ACTION NO. 3:19-cv-00421

(Number to be assigned by Court)

Clifton R. Hudson Ph.D _____

(Enter above the full name of the defendant
or defendants in this action)

COMPLAINT

I. Previous Lawsuits

A. Have you begun other lawsuits in state or federal court dealing with the same facts involved in this action or otherwise relating to your imprisonment?

Yes _____

No X

B. If your answer to A is yes, describe each lawsuit in the space below. (If there is more than one lawsuit, describe the additional lawsuits on another piece of paper, using the same outline).

1. Parties to this previous lawsuit:

Plaintiffs: _____

Defendants: _____

2. Court (if federal court, name the district; if state court, name the county);

3. Docket Number: _____

4. Name of judge to whom case was assigned:

5. Disposition (for example: Was the case dismissed? Was it appealed? Is it still pending?)

6. Approximate date of filing lawsuit: _____

7. Approximate date of disposition: _____

II. Place of Present Confinement: William R. Sharpe Junior Hospital

A. Is there a prisoner grievance procedure in this institution?

Yes X No _____

B. Did you present the facts relating to your complaint in the state prisoner grievance procedure?

Yes X No _____

C. If your answer is YES:

1. What steps did you take? Met with my treatment

team after they denied my grievance.

2. What was the result? Tried to contact my lawyer. He

won't take or return my calls.

D. If your answer is NO, explain why not: _____

III. Parties

(In item A below, place your name and inmate registration number in the first blank and place your present address in the second blank. Do the same for additional plaintiffs, if any.)

A. Name of Plaintiff: Lennie K. Crane

Address: P.O. Box 1042, Weston WV 26452

B. Additional Plaintiff(s) and Address(es): _____

(In item C below, place the full name of the defendant in the first blank, his/her official position in the second blank, and his/her place of employment in the third blank. Use item D for the names, positions, and places of employment of any additional defendants.)

C. Defendant: Clifton R. Hudson

is employed as: Clifton R. Hudson, PH.D.

at Hudson Forensic Psychology Services

D. Additional defendants: _____

IV. Statement of Claim

State here as briefly as possible the facts of your case. Describe how each defendant is involved. Include also the names of other persons involved, dates and places. Do not give any legal arguments or cite any cases or statutes. If you intend to allege a number of related claims, set forth each claim in a separate paragraph. (Use as much space as you need. Attach extra sheets if necessary.)

1) This suit being filed under Civil Rights, Due Process is
composed from Instructions for filing a complaint under
"Civil Rights Act U.S.C. § 1983" and also the "Pro Se
Handbook" sent to me with the actual suit package. I do
know the "COMPLAINT SHOULD NOT contain Legal Arguments
or Citations. There is a statute listed above and also on
page 4, paragraph 1, of "Memorandum of Law / Hudson /". The
citation above is to show I knew the procedure to follow.

IV. Statement of Claim (continued):

and the Citation on page 4, paragraph 1, of the attached Memorandum of Law is to support the whole basis for this suit, which is a criminal offense, by altering Government approved software to deprive citizens of their right to be free; I hope this is acceptable. This Honorable Court has jurisdiction in this matter for the reasons of the "offense of altering medical test equipment" that determines a citizens state of competency is federally mandated and second is that the State hired the Forensics Evaluator so this would show Bias and Discrimination in see page 5A

V. Relief

State briefly exactly what you want the court to do for you. Make no legal arguments. Cite no cases or statutes.

First and foremost I would like for Dr. Hudson to spend some time in jail. I think this is only fair for someone who recklessly and with ~~reckless~~ malice, sentences, or causes people to be sentenced to jail, or a mental facility, with Certified equipment that he has altered. This horrific act is a Modern Day Lobotomy. Furthermore, after his results, that are illegally derived, he comes off as an arrogant person who verbally attacks the patient on any response to a question he has asked the patient. A financial penalty of a

V. Relief (continued)):

workable amount of \$100,000.00 seems appropriate. It is
enough of a penalty to get the public awareness needed from
this individual's behavior and not enough to be ruled excessive.
A formal apology from him to all of the patients he has
deemed incompetent is only appropriate.

VII. Counsel

- A. If someone other than a lawyer is assisting you in preparing this case, state the person's name:

- B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action?

Yes X No _____

If so, state the name(s) and address(es) of each lawyer contacted:

Jim Love, 10533 Main Street, Fairfax Va 22030

If not, state your reasons: _____

- C. Have you previously had a lawyer representing you in a civil action in this court?

Yes _____ No X

If so, state the lawyer's name and address:

Signed this 28 day of MAY, 2019.

Lonnie Kevin Crane
Signature of Plaintiff or Plaintiffs

I declare under penalty of perjury that the foregoing is true and correct.

Executed on Lonnie K. Crane 5/28/19
(Date)

Lonnie K. Crane
Signature of Movant/Plaintiff

Signature of Attorney
(if any)

Statement of Claim continued from page 5; Crane v. Hudson Civil Suit.

their findings.

2) Venue for this case is a Federal Question of Due Process and altered medical test equipment. The Southern District is also correct because the injury and violations occurred in Western Regional Jail which is in this District.

3) The guilty party is; Clifton R. Hudson, Ph.D., 1335 Virginia Street E., Charleston WV 25301, phone # 800-983-2875

4) My basis for this "1983" action is due to the "Gross Negligence" of Dr. Hudson's method of altering the "software", for the approved program, to determine a citizen's right, to an unaltered and constitutional method of testing to determine their competency in a "Court of Law". Since his tests can take away someone's freedom, he should be held to the highest levels of professionalism and expertise when testing an individual with approved tests.

5) The manner in which these tests are to be given should also be under close scrutiny. An "attack" verbally on the subject should not be permitted. By "attack" on the subject, I mean a verbal attack to provoke a "response" from the person being tested. Asking a question, then the act of doubling the answer is abuse, it could be classified as slander which is also a crime.

6) Dr. Hudson plainly states that he altered the PAI, (Personal Assessment Inventory), test. I do not have the 18 page report from Dr. Hudson, so my FACTS

are only from my memory on the altered test. I am not an expert in this field of "theory" and "expert opinion", but know enough to realize that the "altering" of ANY Medical tests is a severe crime and someone who would alter any medical test, for any reason, should be held accountable for perjury.

7) The date of this test was in late May. I cannot give an exact date since I wasn't permitted to bring ANYTHING, including my Legal Papers sealed in 4 manilla envelopes, with me. This act alone should be grounds for "Dismissal." The test date was somewhere in the middle of May at the Western Regional Jail. When I did finally finally get my copy of the 18 page report, I only had 2 days before Court to prepare, in the event I may have to represent myself again to avoid prison.

8) This decision from Dr. Hudson has placed me behind bars and has given me a BAD name. I have worked hard my whole life for the respect I "usually" get from people. This stuff here is the exception.

Read the whole Exhibit A, this way the pages and paragraphs I am using as a reference will make sense.